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January 26, 2009

Mr. Ralph Svetich
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Comments on the Proposition 84 Integrated Regional Water Management
Program Regional Acceptance Process Draft Guidelines

Dear Mr. Svetich,

LA's the Place

On behalf of the Los Angeles Department of Water and Power (LADWP), we are writing in response to your solicitation of comments regarding the development of Proposition 84 Integrated Regional Water Management (IRWM) Regional Acceptance Process guidelines. First, we would like to thank the Department of Water Resources (DWR) for all of the hard work that has been put into creating this process. We agree that regions should be adequately vetted and clearly defined. Below are comments we would like to submit for your consideration.

- **The Regional Acceptance Process guidelines should specify that regions should be defined along watershed boundaries and should show a clear preference for largest workable region.** Although the draft guidelines for the Regional Acceptance Process define desirable and undesirable characteristics of a region, it leaves the general definition of region fairly open to interpretation. We suggest that in the final guidelines these "characteristics" be tightened up to clearly suggest "preferences" and that these desirable characteristics or preferences include taking a watershed approach. We also urge you to maintain the language in the draft guidelines stating preference for the "largest defined contiguous geographic area encompassing the service areas of multiple local agencies..."

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- **Guidelines should clearly discourage splintering of existing IRWM regions that have adopted plans.** By conducting a "region assessment" of all regions, including existing regions, smaller groups may see this as an opportunity to split off from larger groups and in the hopes they might apply for funds separately. This could undermine and significantly set back progress made to date. In the Los Angeles region in particular, DWR strongly suggested that five separate efforts come together to create one plan. The proposed region assessment has the potential to create the impression that it is okay for sub-regions to go their own way, which would effectively *dis-integrate* our region. We recommend that the Region Acceptance Process guidelines clearly indicate that the criteria clearly favor larger, more fully integrated regions and that sub-regions proposing to establish their own region be held to a very high standard in terms of justifying why they should no longer participate in the larger region.

Thank you for this opportunity to comment on the development of the Proposition 84 IRWM Regional Acceptance Process. We are happy to discuss these items with you at your convenience and look forward to working with you as this process moves forward.

Sincerely,



Thomas M. Erb
Director of Water Resources

c: Mr. Mark Cowin, DWR
Ms. Tracie Billington, DWR